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Attorneys for Defendant
CARLOS GUERRERO-ELENES

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CARLOS GUERRERO-ELENES,

Defendant.

Case No.: CR 16-0469 MMC

**STIPULATION AND ~~[PROPOSED]~~ ORDER RE
CONTINUANCE OF JUNE 7, 2017 HEARING**

This matter is currently set for a status/possible change of plea hearing on June 7, 2017. The defense is on track to resolve this matter by way of an open plea. However, the defense requires additional time to resolve additional and necessary issues prior to the entry of a plea and to that end has submitted a request to and through the Criminal Justice Act Coordinator for the appointment of an expert. Defense counsel awaits approval of that request and will need additional time for the expert to complete his work on the defendant's case.

Based on the foregoing, defense counsel requests, the government agrees, and the parties jointly stipulate that the hearing in this matter should be continued to August 30, 2017,

at 2:15 p.m., to allow for the effective preparation of counsel. The parties further agree and stipulate that the time from June 7, 2017, through and including August 30, 2017, may be time excluded from the Speedy Trial Act, in order to ensure the reasonable time necessary for effective preparation of counsel, pursuant to Title 18, United States Code Sections 3161(b), (h)(7)(A), (h)(7)(B)(iv).

Additionally, the parties request and stipulate that the supervised release matter, CR 07-0645 MMC, that is trailing this case, also be continued to August 30, 2017.

SO STIPULATED.

Respectfully submitted,

BRIAN J. STRETCH
United States Attorney

Dated: June 1, 2017

_____/s/_____
SAMANTHA SCHOTT
Special Assistant United States Attorney

Dated: June 1, 2017

_____/s/_____
EDWIN PRATHER
PRATHER LAW OFFICES
Attorneys for Defendant
CARLOS GUERRERO-ELENES

~~[PROPOSED]~~ ORDER

GOOD CAUSE APPEARING and per the parties' stipulation, IT IS HEREBY ORDERED that the status/possible change of plea hearing on June 7, 2017, be continued to August 30, 2017, at 2:15 p.m. The time from June 7, 2017, through and including August 30, 2017, shall be time excluded from the Speedy Trial Act, in order to ensure the reasonable time necessary for effective preparation and continuity of counsel, pursuant to Title 18, United States Code Sections 3161(b), (h)(7)(A), (h)(7)(B)(iv). The supervised release matter, CR 07-0645 MMC, currently set for June 7, 2017, shall also be continued to August 30, 2017, at 2:15 pm.

Dated: June 2, 2017



THE HONORABLE MAXINE M. CHESNEY
UNITED STATES SENIOR DISTRICT JUDGE